

EXHIBIT 2

From: [Campbell, Scott](#)
To: [Kevin Lavelle](#)
Cc: [Loseman, Monica K.](#); [Dan Drosman](#); [Rachel Jensen](#); [Jeremy Daniels](#); [Cox, Trey](#); [Costa, Gregg J.](#); [Turquet Bravard, John L.](#); [Marshall, Lloyd Steven](#); [Megan Rossi](#); [Heather Geiger](#); ["Greene, Douglas W."](#)
Subject: RE: Cassava
Date: Thursday, October 3, 2024 4:18:26 PM

EXTERNAL SENDER

Kevin,

I read questions 3, 4, and (2) as directed to Cassava, and have responded below. The remaining items appear directed to Mr. Barbier and Dr. Burns.

Best,
Scott

Scott Campbell

Of Counsel

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GIBSON DUNN

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1801 California Street Suite 4200, Denver, CO 80202-2642

From: Kevin Lavelle <KLavelle@rgrdlaw.com>
Sent: Tuesday, October 1, 2024 5:32 PM
To: Campbell, Scott <SCampbell@gibsondunn.com>
Cc: Loseman, Monica K. <MLoseman@gibsondunn.com>; Dan Drosman <DanD@rgrdlaw.com>; Rachel Jensen <RachelJ@rgrdlaw.com>; Jeremy Daniels <JDaniels@rgrdlaw.com>; Cox, Trey <TCox@gibsondunn.com>; Costa, Gregg J. <GCosta@gibsondunn.com>; Turquet Bravard, John L. <JTurquetBravard@gibsondunn.com>; Marshall, Lloyd Steven <LMarshall@gibsondunn.com>; Megan Rossi <MRossi@rgrdlaw.com>; Heather Geiger <HGeiger@rgrdlaw.com>; 'Greene, Douglas W.' <dgreene@bakerlaw.com>
Subject: RE: Cassava

Doug and Scott, I am following up on my below email. Specifically:

1. Do we have consent from Mr. Barbier and Dr. Burns to file the joint motion? Please let us know by close of business tomorrow or we will note they take no position.
2. Please advise when Mr. Barbier will provide his updated interrogatory response.
3. Please explain why Dr. Burns and Cassava have been unable to locate and produce the May 14, 2020 un-blinding email, which we understand was sent from Dr. Burns's Cassava email account.

As previously noted, this email from more than 4 years ago does not appear in Cassava's files. Consistent with Judge Bemporad's direction and October 1 Order, we will log documents received from the SEC for discussion at the next Status Conference.

4. Please let us know if Defendants and the directors intend on standing on their objections to Plaintiffs' July 19, 2024 document requests and subpoenas.

I do not know what you mean by "stand on our objections." We lodged objections, and believe you understand that the primary reason for us not responding is that these requests relate to allegations you have told us for months you intend to bring, but have not actually brought. You also indicated to Judge Bemporad that you intend to move to supplement your Complaint in the next 30 days. If you are successful in amending, we will certainly revisit our objections.

Separately, please let us know (1) if Mr. Barbier or Dr. Burns have received target letters from the DOJ, or have otherwise been informed they are targets, or whether they have been informed they are unlikely be to targets in the investigation; (2) when the documents that were removed from Cassava's final privilege log will be produced; **We will produce these documents within a reasonable time. I expect most or all will be produced within 10 business days.** and (3) whether Mr. Barbier or Dr. Burns will have their own privilege log in addition to Cassava's.

Please provide a response on these remaining issues, other than on the joint motion in item one, by close of business Thursday.

-Kevin

From: Kevin Lavelle

Sent: Friday, September 27, 2024 9:00 AM

To: 'Campbell, Scott' <SCampbell@gibsondunn.com>

Cc: Loseman, Monica K. <MLoseman@gibsondunn.com>; Dan Drosman <DanD@rgrdlaw.com>; Rachel Jensen <RachelJ@rgrdlaw.com>; Jeremy Daniels <JDaniels@rgrdlaw.com>; Cox, Trey <TCox@gibsondunn.com>; Costa, Gregg J. <GCosta@gibsondunn.com>; Turquet Bravard, John L. <JTurquetBravard@gibsondunn.com>; Marshall, Lloyd Steven <LMarshall@gibsondunn.com>; Megan Rossi <MRossi@rgrdlaw.com>; Heather Geiger <HGeiger@rgrdlaw.com>; Greene, Douglas W. <dgreene@bakerlaw.com>

Subject: RE: Cassava

Doug,

Please confirm we have your consent to file the joint motion for the Swedish depositions.

Scott,

Following-up on our call yesterday and your prior email, please see our responses below.